



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

VIA FACSIMILE  
(619) 532-0983

February 7, 2000

Luciano Ocampo  
Engineering Field Activity Division Southwest, BRAC Office  
1220 Pacific Hwy  
San Diego, CA 92132-5190

Re: U.S. EPA Review of Draft Final Marsh Crust Feasibility Study for Alameda Annex and Alameda NAS

Dear Mr. Ocampo:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed "Draft Final Feasibility Study for the Marsh Crust and Groundwater at the Fleet Industrial Supply Center Oakland Alameda Facility/Alameda Annex and Feasibility Study for the Marsh Crust and Former Subtidal Area at Alameda Point" (Marsh Crust FS). The Marsh Crust FS was prepared by TetraTech EM Inc. on behalf of the Department of the Navy (Navy) and is dated January 6, 2000.

Based upon U.S. EPA's review of the Alameda Marsh Crust FS, the following general and specific comments apply:

General Comments:

1. U.S. EPA disagrees with language in the executive summary that there is no unacceptable risk from Marsh Crust (e.g. p. ES-3). In addition, this language is inconsistent with statements in the document that the no action alternative is not protective. The Navy needs to consistently explain that the reason this FS is being prepared is that there is a potential future risk if, as a result of construction activities, soil is excavated to the depth of the Marsh Crust/Subtidal Area and disposed of at the surface. For example, "Although there is currently no complete exposure pathway to the Marsh Crust contamination, there is the possibility of unacceptable risk if the soil were brought to the surface, where it could remain as a source of exposure and could pose an unacceptable risk to human health and the environment." Similarly with the groundwater, "Although there is currently no complete exposure pathway to the groundwater contamination, there is the possibility of unacceptable risk if there were accidental ingestion by humans, or ingestion resulting from well construction inconsistent with current well construction regulations."

2. In several sections of the Marsh Crust FS, the Navy uses the term "acceptable risk range" (e.g., pp. ES-3, 1-18, 1-19, 1-20.). U.S. EPA considers an excess cancer risk level of  $10^{-6}$  as the point of departure for considering when to implement remedial measures at a site. Cancer risks above a risk level of  $10^{-4}$  generally require remediation. The range between  $10^{-6}$  and  $10^{-4}$  is generally referred to as the "risk management range," and sites having cancer risks which fall into this range may, or may not require remediation, based upon the nature and extent of contamination, potential exposure, and other site-specific factors. For noncarcinogens, the point of departure corresponds to a hazard index (HI) of 1. U.S. EPA requests that the phrase "acceptable risk range" be replaced with "risk management range".

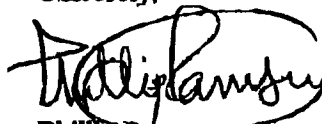
**Specific Comments:**

1. Executive Summary, ES-5: Text indicating a HHRA was completed as part of the Annex RI states, "[t]he HHRA concluded that groundwater does not present an excess lifetime cancer risk greater than  $1.0E-06$ ..." Executive Summary text should accurately summarize risks that have been assessed as part of the Baseline HHRA and reference the Final HHRA dated January 26, 2000. The Final Baseline HHRA indicates an excess cancer risk of  $6.0E-5$  was calculated for carwash worker scenario (see Table 12 for Alameda Facility/Alameda Annex SMWU-1).
2. Chapter 1, Introduction and Site Characterization:
  - A. Same comments as above regarding the term "acceptable risk range" (see e.g. p. 1-18, 1-19, 1-20.)
  - B. Page 1-2 first paragraph, "principals" should be "principles." (Same thing p. 1-3 par. 2.)
  - C. On page 1-16, text references a July 1999 Groundwater Beneficial Use Determination Report. U.S. EPA possesses a Final Groundwater Beneficial Use Determination Report, dated October 29, 1999.
  - D. Page 1-18, Sec. 1.5.1 first paragraph, after word "depth" add "unless soil is brought to the surface during construction activity."
3. Chapter 2 -- Remedial Alternatives:
  - A. Page 2-1: The FS continues to assert that "no unacceptable risks were identified." This should be changed to a statement such as discussed above that the purpose of the FS is to deal with the possibility of a release if soils were brought to the surface.

- B. Considering the streamlined nature of this FS, the anticipation that the selected remedy will be institutional controls, and the fact that U.S. EPA does not consider the active remediation alternatives to be a viable alternative, U.S. EPA has not reviewed action-specific ARARs that would apply to the active remedies (nos. 3 and 4). In addition, because the FS indicates that there is no ecological risk, we have not analyzed whether other location-specific ARARs such as the Endangered Species Act would apply.
- C. Page 2-8, Sec. 2.5.1.2. Description of alternative 2 (institutional controls) for Marsh Crust: The FS (and certainly the ROD) should include a more complete description of the deed restriction. It should describe the specific activities which would be restricted or the specific conduct which the deed restriction would require.
- D. Section 2.5.1.2: The IC remedy proposed in this FS does not include any retention by the Navy of the ability to enforce the land-use covenant. U.S. EPA generally recommends that when federal property is transferred and contamination remains in place, that the United States (in this case, the Navy) retain an interest in enforcing institutional controls. Therefore, with regard to the Marsh Crust land use covenant, U.S. EPA recommends that the Navy consider retaining an interest and retaining the ability to enforce the covenant. As an alternative, the Navy should consider more explicitly conditioning the transfer of any property underlain by Marsh Crust on having an executed agreement between DTSC and the City to effect the land use covenant. In the ROD, the Navy will need to spell out in much more detail how and when the covenant is being established, and what assurances the United States has that the covenant will in fact be established.
- E. Sec. 2.5.2.2. Alternative 2 (Shallow Groundwater). U.S. EPA has similar concerns as expressed above regarding the Marsh Crust institutional control.

If you have any questions concerning this letter, please do not hesitate to contact me at (415) 744-2365.

Sincerely,



Phillip Ramsey  
Remedial Project Manager

cc: please see next page

cc: Mr. Dick Hegarty, BEC FISC Annex  
Navy Transition Office  
950 W. Mall Square, Suite 200  
Alameda, CA 94501

Ms. Mary Rose Cassa  
California Department of Toxic Substances Control  
700 Heinz Avenue, Suite 200  
Berkeley, CA 94710-2721

Mr. Brad Job  
California Regional Water Quality Control Board - San Francisco Bay Region  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

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Ms. Dina Tasini  
Alameda Reuse And Redevelopment Authority  
950 West Mall Square  
Alameda, CA 94501



## Tetra Tech EM Inc.

10670 White Rock Road, Suite 100 ♦ Rancho Cordova, CA 95670 ♦ (916) 852-8300 ♦ FAX (916) 852-0307  
October 16, 2000

Mr. Lou Ocampo, PE  
Remedial Project Manager  
Naval Facilities Engineering Command  
BRAC Operations, Southwest Division  
1230 Columbia Street, Suite 1100  
San Diego, California 92132-5190

**Subject: Various Correspondence from Regulatory Agencies for inclusion into the  
Administrative Record for the Fleet and Industrial Supply Center, Oakland  
Alameda Facility/Alameda Annex, or Alameda Point, Alameda, California CLEAN  
Contract No. N62474-94-D-7609, Contract Task Order No. 271**

Dear Mr. Ocampo:

Per your request enclosed is one copy of the following correspondence for your files:

- Draft Operable Unit (OU)-1 Remedial Investigation (RI) comments from United States Environmental Protection Agency (EPA), dated April 10, 1998.
- Draft OU-1 RI comments from Department of Toxic Substance Control (DTSC), dated April 15, 1998.
- Revised Draft OU-1 RI comments from DTSC, dated November 3, 1998.
- Revised Draft OU-1 RI comments from EPA, dated November 6, 1998.
- EPA Review of Draft Final Marsh Crust Feasibility Study for Alameda Annex and Alameda Naval Air Station dated February 7, 2000.
- DTSC comments on Draft Final Feasibility Study for the Marsh Crust and Groundwater at the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex and for the Marsh Crust and Former Subtidal Area at Alameda Point dated February 7, 2000.
- EPA comments on the Action Memorandum for Marsh Crust Time-Critical Removal Actions at East Housing Area dated March 14, 2000.
- EPA Review of Public Draft Record of Decision/Remedial Action Plan for Marsh Crust and Groundwater at Alameda Annex and Marsh Crust and Former Subtidal Area at Alameda Point dated July 19, 2000.

Six copies of each correspondence have been forwarded to Ms. Dianne Silva for inclusion into the administrative record files at Alameda Facility/Alameda Annex or Alameda Point.

If you have any questions, please call me at (916) 853-4512.

Sincerely,

Mark R. Reisig  
Project Manager

Enclosure

cc: Ms. Diane Silva, Navy Information Repository (3 copies of each)  
File

TC.0271.10613



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TETRA TECH EM INC.

TRANSMITTAL/DELIVERABLE RECEIPT

Contract No. N62474-94-D-7609

Document Control No. TC . 0271 . 10613

TO: Mr. Richard Selby, Code 02R1  
Contracting Officer  
Naval Facilities Engineering Command  
Southwest Division  
1230 Columbia Street, Suite 1100  
San Diego, CA 92132-5190

DATE: 10/16/00  
CTO: 0271  
LOCATION: Alameda Annex, Alameda

FROM: *Daniel Chow*  
Daniel Chow, Program Manager

DOCUMENT TITLE AND DATE:

Various Correspondence from Regulatory Agencies for inclusion into the Administrative Record  
for the Fleet and Industrial Supply Center, Oakland Alameda Facility/Alameda Annex, or  
Alameda Point, Alameda, California. Dated October 16, 2000 (These documents are forwarded  
to Ms. Diane Silva for inclusion into the Alameda Annex or Alameda Point information repository.)

TYPE: ☐ Contractual Deliverable ☐ Technical Deliverable ☒ Other

VERSION: Final REVISION #: NA  
(e.g., Draft, Draft Final, Final)

ADMIN RECORD: Yes ☒ No ☐ CATEGORY: Confidential ☐

SCHEDULED DELIVERY DATE: 10/18/00 ACTUAL DELIVERY DATE: 10/18/00

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C = copy of transmittal form  
E = enclosure

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D. Silva (4MG.DS)		
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L. Holloway (03EN.LH)		
1C/1E		

Date/Time Received